



Flora Inc. – Quality Assurance Department
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Aug 9, 2005

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

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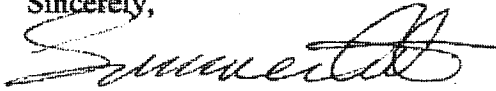
Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Flora Inc. supports the continued allowance of the following substance(s):

<i>Name of Substance</i>	<i>Location on National List (ie. 205.605(a))</i>	<i>Reason for continued allowance.</i>	<i>Supporting Documents (example: research data or other international organic programs)</i>
Citric acid	205.605(a)(1)(i)	It is the best known, most stable acidifying agent used to reduce pH of a product for thermo-processing and for ultimate product safety. It is a far more superior alternative compared to the use of chemical preservatives for organic products.	Allowed processing aids - EU organic regulation 2092/91

Lecithin, Bleached	205.605(b)(15)	An effective emulsifying agent	Allowed ingredient from non-agricultural origin which have not been produced organically – EU organic regulation 2092/91
Lecithin, unbleached	205.606(d)	An effective emulsifying agent	Allowed ingredient from non-agricultural origin which have not been produced organically – EU organic regulation 2092/91
Nitrogen	205.605(a)(12)	An inert gas used as a processing aid to eliminate oxygen which is a factor causing oxidation of organic unrefined oils. The use of this inert gas does not contaminate or alter the nature of an organic product.	Allowed processing aids - EU organic regulation 2092/91
Peracetic acid		The only alternative to organic grain alcohol as a non-rinse sanitizer.	
Tocopherols	205.605(b)(35)	It is a good alternative to rosemary extract in the prevention of lipid oxidation. Rosemary extract is often extracted by organic solvent and therefore not suitable for organic products.	Allowed ingredient from non-agricultural origin which have not been produced organically – EU organic regulation 2092/91

Sincerely,

A handwritten signature in black ink, appearing to read "Summer Sit", with a stylized flourish at the end.

Summer Sit

Quality Assurance Manager

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